

United States District Court
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

LUIS TORRES, et al.

§
§
§
§
§
§

v.

CIVIL ACTION NO. 3:20-CV-3464-S

BERRY CORPORATION, et al.

§

STIPULATION AND ORDER

Lead Plaintiffs Luis Torres, Allia DeAngelis, and Darrick Inman (“Lead Plaintiffs”), by and through their counsel, and Defendants Berry Corporation, Arthur Smith, Cary Baetz, Gary Grove, Brent Buckley, Kaj Vazales, and Eugene Voiland (collectively, “Defendants”), by and through their counsel, hereby stipulate to the following:

On January 4, 2022, the Court entered an order approving the parties’ stipulation regarding Defendants’ Motion to Dismiss and Responsive Brief Filing Schedule [ECF No. 62]. The Court set the following deadlines:

1. Defendants shall file their Joint Motion to Dismiss the Amended Complaint on or before January 24, 2022;
2. Lead Plaintiffs shall file their opposition to the Joint Motion to Dismiss the Amended Complaint on or before March 21, 2022; and
3. Defendants shall file their reply in support of the Joint Motion to Dismiss the Amended Complaint on or before May 16, 2022.

On March 17, 2022, Plaintiffs’ counsel conferred with Defendants’ counsel to request an additional three weeks to file an Opposition to the Motion to Dismiss. Defendants’ counsel agreed

to Plaintiffs' counsel's request, provided Defendants receive a similar three-week extension on their reply deadline.

Therefore, the parties now stipulate to an amended briefing schedule, subject to the Court's approval. The new proposed schedule is:

1. Lead Plaintiffs shall file their opposition to the Joint Motion to Dismiss the Amended Complaint on or before April 11, 2022; and
2. Defendants shall file their reply in support of the Joint Motion to Dismiss the Amended Complaint on or before June 6, 2022.

IT IS SO STIPULATED.

DATED: March 17, 2022

Respectfully submitted,

POMERANTZ LLP

/s/ Omar Jafri

Omar Jafri (*Pro Hac Vice*)
Ten South La Salle Street, Suite 3505
Chicago, Illinois 60603
Telephone: (312) 377-1181
Facsimile: (312) 377-1184
E-mail: ojafri@pomlaw.com

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

Phillip Kim, Esq.
275 Madison Avenue, 40th Floor
New York, NY 10116
Phone: (212) 686-1060
Fax: (212) 202-3827
Email: pkim@rosenlegal.com

Attorneys for Co-Lead Plaintiffs

BAKER & HOSTETLER LLP

/s/ Tamara D. Baggett

Tamara D. Baggett
2850 North Harwood Street, Suite 1100
Dallas, TX 75201
Telephone: 214-210-1200
Facsimile: 214-210-1201
tbaggett@bakerlaw.com

Douglas W. Greene (*Pro Hac Vice*)

45 Rockefeller Plaza
New York, NY 10111-0100
Telephone: 212-589-4200
Facsimile: 212-589-4201
dgreen@bakerlaw.com

Genevieve G. York-Erwin (*Pro Hac Vice*)

999 Third Avenue, Suite 3900
Seattle, WA 98104-4040
gyorkerwin@bakerlaw.com
Telephone: 206-332-7079
Facsimile: 206-624-7317

Attorneys for Defendants

SO ORDERED.

SIGNED March 21, 2022.


Karen Gren Scholer
KAREN GREN SCHOLER
UNITED STATES DISTRICT JUDGE